

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	<b>:</b>	<b>CRIMINAL NO.</b> _____
<b>v.</b>	<b>:</b>	<b>DATE FILED:</b> _____
<b>ANTHONY CAPERELLI</b>	<b>:</b>	<b>VIOLATIONS:</b>
	<b>:</b>	<b>26 U.S.C. § 7201 (Tax Evasion - 4 counts)</b>
	<b>:</b>	

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**INFORMATION**

**COUNT ONE**

**THE UNITED STATES ATTORNEY CHARGES THAT:**

1. During the calendar year 1998, defendant ANTHONY CAPERELLI received approximately \$154,333.00 in unreported taxable income, upon which there was owing to the United States an income tax of approximately \$35,394.00.

2. On or about April 15, 1999, in the Eastern District of Pennsylvania, defendant

**ANTHONY CAPERELLI,**

a resident of Philadelphia, Pennsylvania, willfully attempted to evade and defeat an income tax due and owing by him to the United States of America for the calendar year 1998 by failing to make an income tax return on or about April 15, 1999, as required by law, to any proper officer of the Internal Revenue Service, and by failing to pay to the Internal Revenue Service this income tax, and by concealing and attempting to conceal from all proper officers of the United

States of America his true and correct income through various means, including, among other things: (1) receiving income in cash; (2) using multiple bank accounts; and (3) dealing in cash.

In violation of Title 26, United States Code, Section 7201.

**COUNT TWO**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. During the calendar year 1999, defendant ANTHONY CAPERELLI received approximately \$121,993.00 in unreported taxable income, upon which there was owing to the United States an income tax of approximately \$25,163.00.

2. On or about April 15, 2000, in the Eastern District of Pennsylvania, defendant

**ANTHONY CAPERELLI,**

a resident of Philadelphia, Pennsylvania, willfully attempted to evade and defeat an income tax due and owing by him to the United States of America for the calendar year 1999 by failing to make an income tax return on or about April 15, 2000, as required by law, to any proper officer of the Internal Revenue Service, and by failing to pay to the Internal Revenue Service this income tax, and by concealing and attempting to conceal from all proper officers of the United States of America his true and correct income through various means, including, among other things: (1) receiving income in cash; (2) using multiple bank accounts; and (2) dealing in cash.

In violation of Title 26, United States Code, Section 7201.

**COUNT THREE**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. During the calendar year 2000, defendant ANTHONY CAPERELLI received approximately \$64,376.00 in unreported taxable income, upon which there was owing to the United States an income tax of approximately \$8,699.00.

2. On or about April 15, 2001, in the Eastern District of Pennsylvania, defendant

**ANTHONY CAPERELLI,**

a resident of Philadelphia, Pennsylvania, willfully attempted to evade and defeat an income tax due and owing by him to the United States of America for the calendar year 2000 by failing to make an income tax return on or about April 15, 2001, as required by law, to any proper officer of the Internal Revenue Service, and by failing to pay to the Internal Revenue Service this income tax, and by concealing and attempting to conceal from all proper officers of the United States of America his true and correct income through various means, including, among other things: (1) receiving income in cash; (2) using multiple bank accounts; (3) conducting financial transactions in the name of his daughter; and (4) dealing in cash.

In violation of Title 26, United States Code, Section 7201.

**COUNT FOUR**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. During the calendar year 2001, defendant ANTHONY CAPERELLI received approximately \$77,905.00 in unreported taxable income, upon which there was owing to the United States an income tax of approximately \$11,494.00.

2. On or about April 15, 2002, in the Eastern District of Pennsylvania, defendant

**ANTHONY CAPERELLI,**

a resident of Philadelphia, Pennsylvania, willfully attempted to evade and defeat an income tax due and owing by him to the United States of America for the calendar year 2000 by failing to make an income tax return on or about April 15, 2002, as required by law, to any proper officer of the Internal Revenue Service, and by failing to pay to the Internal Revenue Service this income tax, and by concealing and attempting to conceal from all proper officers of the United States of America his true and correct income through various means, including, among other things: (1) receiving income in cash; (2) using multiple bank accounts; (3) structuring financial transactions to avoid IRS reporting requirements; and (4) dealing in cash.

In violation of Title 26, United States Code, Section 7201.

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PATRICK L. MEEHAN  
United States Attorney  
Eastern District of Pennsylvania

DATE: \_\_\_\_\_